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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

HECTOR GONZALEZ,

Petitioner,

vs.

BRIAN WILLIAMS, et al.,

Respondents.

Case No.: 2:15-cv-00618-RFB-CWH

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
ANSWER TO REMAINING GROUNDS OF  
PETITIONER'S PETITION FOR WRIT OF  
HABEAS CORPUS  
(ECF NO. 10)**

(First Request to Extend Time to Answer)

THE RESPONDENTS ABOVE-NAMED, through legal counsel ADAM PAUL LAXALT, Attorney General of Nevada, by Dennis C. Wilson, Senior Deputy Attorney General, hereby request an extension of an additional sixty (60) days, up to and including, August 28, 2017, to file their Answer to the Remaining Grounds of Petitioner's Petition for Writ of Habeas Corpus. (ECF No. 10.)

This motion is premised upon the accompanying affidavit of counsel.

DATED this 29th day of June, 2017.

ADAM PAUL LAXALT  
Attorney General

By: /s/ Dennis C. Wilson  
Dennis C. Wilson (Bar. No. 4420)  
Senior Deputy Attorney General

**DECLARATION OF DENNIS C. WILSON**

STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

I, DENNIS C. WILSON, being first duly sworn under oath, depose and state as follows:

1. I am employed as a Senior Deputy Attorney General in the Office of the Nevada Attorney General, licensed to practice law in the State of Nevada, and admitted to practice before this Court;

2. Pursuant to my duties as a Senior Deputy Attorney General, I have been assigned to represent Respondents in the instant matter of *Hector Gonzalez v. Brian Williams, et al*, 2:15-cv-00618-RFB-CWH and, as such, have personal knowledge of the matters contained herein;

3. This Motion for Enlargement of Time is made in good faith and not for the purpose of delay;

4. On June 27, 2017, petitioner's counsel informed me that he has no objection to the requested 60-day extension of time;

5. The Answer to the remaining claims herein is due to be filed on June 29, 2017;

6. Due to my caseload demands, I have been unable with due diligence to timely file the answer herein. Since the Court issued its May 30, 2017 order, I prepared for and appeared at the Ninth Circuit Court of Appeals for Oral Argument in the case of *Taniko Smith v. Brian Williams* (15-16967) which was held on June 8, 2017, in Pasadena, California.

7. I have also prepared responses in the following federal cases: *Carley v. Gentry*, Case No.: 2:14-cv-02097-JCM-PAL; *Perkins v. LeGrand*, Case No. 2:14-cv-00434-JAD-PAL; *Leavitt v. Neven*, Case No. 2:12-cv-00625-MMD-JWK; *Leavitt v. Baca*, Case No. 2:12-cv-00987-JCM-CWH; and *Duda v. Neven*, Case No.: 2:16-cv-01176-JCM-CWH;

8. In July and August of 2017, I have responses due in the following federal cases: *Chavez v. LeGrand*, Case No. 3:14-cv-00373-RCJ-VPC; *Carley v. Nevens*, Case No. 2:16-cv-02227-JAD-PAL; *Heusner v. Neven*, Case No. 2:14-cv-01119-APG-GWF; *Harris v. Williams*, Case No. 2:16-cv-01305-JAD-CWH; *Denson v. Gentry*, Case No. 2:15-cv-01473-APG-PAL; *Ragland v. Williams*, Case No.

1 2:15-cv-02104-APG-GWF; *Nika v. Filson*, Case No. 3:09-cv-00178-JCM-WGC; and *Green v. Baker*,  
2 Case No. 3:11-cv-00230-MMD-VPC.

3 Based on the foregoing, I request sixty (60) days up to and including August 22, 2017, to file  
4 the Answer herein.

5 DATED this 29<sup>th</sup> day of June, 2017.

6  
7 /s/ Dennis C. Wilson  
8 Dennis C. Wilson (Bar. No. 4420)  
9 Senior Deputy Attorney General

10 IT IS SO ORDERED:

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12 RICHARD F. BOULWARE, II  
13 United States District Judge

14 DATED this 28th day of July, 2017.  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing *Unopposed Motion for Enlargement of Time to File Answer to Remaining Grounds of Petitioner's Petition for Writ of Habeas Corpus* with the Clerk of the Court by using the CM/ECF system on the 29th day of June, 2017.

The following participants in this case are registered CM/ECF users and will be served by the CM/ECF system:

Jeremy Baron  
Assistant Federal Public Defender  
411 E. Bonneville Ave., Ste. 250  
Las Vegas, NV 89101

/s/ R. Holm  
An employee of the Office of the Attorney General